

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

ROBERT D. KLINE,

Plaintiff,

v.

UNITED NORTHERN MORTGAGE  
BANKERS LIMITED, ET AL.,

Defendants.

Case No. 4:18-CV-00489-MWB

Judge: Hon. Matthew W. Brann

**DEFENDANT UNITED NORTHERN'S  
MOTION TO DISMISS THE COMPLAINT**  
**(Oral Argument Requested)**

The Defendant, United Northern Mortgage Bankers Ltd. (“United Northern”), by and through its undersigned counsel, Weiner Brodsky Kider PC, hereby moves to dismiss the Complaint filed by Plaintiff, Robert D. Kline (“Plaintiff”), on February 28, 2018, in its entirety, for failure to state a claim upon which relief may be granted, pursuant to the Rule 12(b)(6) of the Federal Rules of Civil Procedure. The grounds for this motion are set forth in the accompanying memorandum of law, which is incorporated herein by reference. United Northern also respectfully requests oral argument on its motion.

Respectfully submitted,

By: /s/ Timothy P. Ofak

Timothy P. Ofak (PA Bar No. 203087)

Jason W. McElroy (Pro Hac Vice)

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